

Whereas the previous Office Action referred to col. 7, lines 37-47, of the patent as indicating that the words in the dictionary "are indexed based on their frequency" (see top of page 5 of previous Office Action), the rejection in the current Office Action now asserts that "the candidate words that are displayed are determined by a statistical analysis, which means that there is a counting of the words most frequently selected." The Response to Arguments further asserts that the "list of candidate words will change based on the text that is entered by the user thus there will be a different set of words with a different order that make up said candidate list" (see page 2 of Office Action). The cited portion of the patent reads as follows:

"Alternatively, the words in the dictionary can be statistically determined in part from sample text, including text previously input by the user into the cellular telephone unit. That is, new words input by the user can be automatically added to the dictionary based on frequency of input of such new words. For example, if the telephone 1 can hold 100 new words, all new words not found in the pre-defined dictionary would be automatically indexed and added to the dictionary. In addition, the frequency of use of each such word can be counted by associating an additional count or time stamp field with each word. Once the new word capacity of the telephone 1 is exhausted, a least recently used algorithm can be used to replace infrequently used words with new words more recently input by the user." (underlining added)

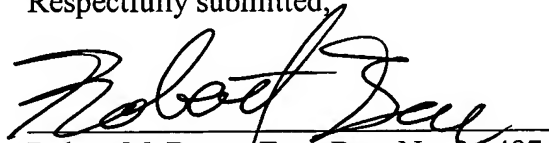
This patent portion thus relates to the determination of which words are to be stored in the dictionary of Schroeder when there is a limit to the number of words which can possibly be saved in the dictionary. This portion does not relate to or determine which ones of the words in the dictionary are to be selected to be displayed. The statistical analysis at col. 7, line 37, of the patent is carried out on sample text to determine the words that should be stored in the dictionary and does not relate to the selection of candidate words to be displayed. Indeed, it is explicitly stated to be an alternative to the direct entry of words to the dictionary described in the previous paragraph of the patent (col. 7, lines 26-36). The display of words is determined by a separate dictionary lookup routine which is discussed at col. 6, lines 23-34, of the patent.

Obviousness Rejection

The grounds for the obviousness rejection of claims 3, 11, 13 and 14 are set forth in part 6 on pages 5-7 of the Office Action. The claims are rejected as being obvious over U.S. Published Patent Application No. 2002/0151334 to Sharma in view of U.S. Patent No. 5,797,098 to Schroeder. Specifically, the rejection asserts that one of ordinary skill in the art would have modified Sharma to include the features of the Schroeder embodiment discussed above. Applicants thus traverse the obviousness rejection since even if one did modify Sharma to include the features of the Schroeder embodiment, it still would not have result in the claimed invention for at least the reasons stated above in response to the anticipation rejection.

The Commissioner is hereby authorized to charge the amount of \$910 (\$790 for the RCE and \$120 for the one-month extension of time), and any additional fees, or credit any overpayment which may be required with this communication, to **Deposit Account No. 10-0100 (NOKIA.41US)**.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert M. Bauer", is written over a horizontal line.

Robert M. Bauer, Esq., Reg. No. 34,487
Lackebach Siegel, LLP
One Chase Road
Scarsdale, NY 10583
(Telephone) 914-723-4300
(Facsimile) 914-723-4301

August 8, 2005

Date